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**Before the
Federal Communications Commission
Washington DC 20554**

In the Matter of:

Schools and Libraries Universal Service)
Support Mechanism) CC Docket No. 02-6
)

Comments of the American Library Association

The American Library Association (ALA) is the oldest and largest library association in the world with some 64,000 members, primarily school, public, academic and some special librarians, but also trustees, publishers, and friends of libraries. The Association's mission is to provide leadership for the development, promotion and improvement of library and information services and the profession of librarianship in order to enhance learning and ensure access to information for all.

The following comments are the culmination of the efforts of ALA's E-rate Task Force which is a member body that has served the entire ALA membership by becoming intimately familiar with the E-rate program and its impacts in the library community. For nearly four years this group of experts has shared its collective wisdom with ALA, the FCC and the SLD. This effort is one that ALA believes has been of benefit of the entire E-rate community and we appreciate this opportunity for it to continue.

Introduction

Since the E-rate program's inception, the SLD, USAC, and FCC have, and continue, to make improvements to program integrity and to prevent waste, fraud, and abuse, gaming the system, and gold plating. It appears that many funding denials are the result of applicants' honest errors, and most reports of inappropriate activity involve inappropriate requests, not actual awards. But this is difficult to quantify because of the lack of available documented information about abuses.

We applaud SLD's implementation of a Waste Fraud, and Abuse Task Force to address these issues. The examination of the program should not be limited to waste in program funding commitments, but should also examine the unnecessary demands of time and resources at the local level to comply with overly complex rules and procedures. Many suggestions noted below address program improvements that ease the administrative burden without sacrificing quality of review and oversight.

Sound application of the principals of root cause analysis should guide the Commissions' decision making. We also recommend the Commission permit the flexibility to spend program resources to make substantive improvements. The FCC and SLD should look to the total cost of ownership of the program and its components when making any changes.

The ALA E-rate Task Force developed these comments with three primary goals in mind: 1) maintain or improve equity; 2) protect program integrity; 3) ease the applicant burden. Therefore, it is from this

perspective that we are able to suggest and support the following recommendations for changes to the E-rate program. We strongly encourage the Commission to take bold steps but also implore the Commissioners to make changes in a timely manner to allow applicants and vendors to be appropriately prepared.

Our response is organized in the following broad categories:

1. Proposed Unused Funds Carryover Rules
2. Technology Plans
3. Computerized Eligible Services List
4. Other Measures to Prevent Waste, Fraud, and Abuse
 - a. Applicant Issues
 - b. Application and Review Process
 - c. Eligible Services and Products
 - d. Procurement Practices
 - e. Miscellaneous Areas

1. Proposed Unused Funds Carryover Rules

We understand the Commission's concern that each year a large amount of committed funding goes unspent. Unspent funds are inherent in any funding program, whether it be a grant or discount program. In fact, it is healthy for applicants to realize that they did not need all of the funding and return it to the Administrator.

We believe there are unspent funds through the E-rate program for several reasons:

- Application window so far in advance of funding year that it is difficult to anticipate costs. (Applicants have not completed annual budget cycle;
- High turnover in personnel at the applicant level that are responsible for completing the forms;
- Rules not allowing applicants to change or upgrade services;
- Usage-sensitive long distance and Internet services must be estimated during the application process since usage varies month-to-month.

In addition, we believe the amount of committed, but unspent funds will continue to grow because so many applicants are missing the new 486 deadline. Keeping in mind that in some cases, unspent funds are inevitable and should not be viewed as a black mark on the program, we suggest these possible solutions:

- Allow entities to change or upgrade services during the funding year;
- Provide outreach to new E-rate coordinators during the entire funding year;

2. Technology Plans

ALA concurs with the Commission that technology Plans should not need approval before the actual starting date of services.

3. Computerized Eligible Services List

ALA fully supports a computerized Eligible Services List (ESL). As the program is currently configured, applicants are frequently reluctant to procure newly available services because they cannot be assured before application that the service is eligible. Services listed as conditional on use are even more problematic for applicants, particularly the less technically astute, for the same reason. A publicly available list of services that are approved would greatly assist the applicants. The exclusion of any service or technology component from the list should not be grounds for automatic denial.

4. Other Measures to Prevent Waste, Fraud, and Abuse

a. Applicant Issues

(1) Applicants should be restricted to applying for internal connections funding on an every other year or every two-year basis, rather than on an annual basis

Internal connections applications should only be for Internal Connections on a site specific basis. This proposal will reduce the opportunity for waste, fraud, and abuse. More importantly, it will help level the playing field by providing a greater opportunity for less than 90% applicants to obtain funding. Maintenance services and extended warranties would be exempted as they are normally billed on an annual basis. We suggest the FCC fund these services for two years to reduce the administrative burden on both applicant and SLD. Applicants should not suffer an adverse impact; however, it will require their planning and budgeting to be thorough. We believe this option maintains support for Internal Connections services, while reducing the opportunity for waste, fraud, and abuse.

Maintenance in the Telecommunications or Internet Access categories, however, would remain eligible as it is under the current Eligible Services List. This proposal addresses waste, fraud, and abuse by limiting its potential.

(2) Revisions and Reforms of the Letters of Agency (LOAs) Procedures

Revise the structure of Letters of Agency (LOA). LOAs should be effective for the length of time the school or library is a member of the consortia. The policy adopted by the administrator of a three year limit is artificial and does not represent business practices of consortia. The membership is easily checked through the Form 471 and any questions or doubts can be pursued during PIA review.

We also strongly recommend that the data required for LOAs and Forms 479 be combined into a single document that can be filed and stored electronically by consortia. Applicants could still opt to use separate LOAs if their circumstances, such as no requirement for CIPA compliance, dictated. The FCC should not place any additional burdens on the format in which the filing occurs. These measures would reduce both the administrative burden on the applicant as well as expedite the review process thereby conserving valuable program.

Many consortia, particularly library consortia, are long standing institutions with well established and easily identifiable membership. The Commission and the Administrator should not impose additional burdens to continually collect LOAs. The Commission and the Administrator should distinguish between legally constituted consortia and those that are loosely formed and governed buying clubs in LOA rules.

(3) Consultants should be required to register with SLD

Consultants operate at the fringes of the E-rate program. It is difficult for applicants to determine whether a consultant is legitimately operating separately from a service provider and it is impossible for SLD to determine who is operating as a consultant.

We propose creation of a mandatory registration system for consultants that utilizes a SPIN-type number. Consultants would have to file document similar to the SPIF, giving their contact information. This would help SLD determine whether there is a prohibited connection to a current service provider, and would allow SLD to add this information to the BEAR/SPIN search function, making it possible for applicants to identify who is participating in the program “officially” as a consultant. Having a

registration mechanism for consultants would allow them to be identified, which would make it easier for SLD/FCC to seek enforcement against program rule violators.

ALA also proposes that FCC/USAC conduct outreach to the consultant community, including mandatory training for consultants to attend before they are permitted to register. This registration would be publicly available to the applicant community via the SLD web site. We would exclude public employees such as state library agencies and state departments of education from the registration requirement.

In addition to the benefits to the applicants, this would allow PIA, when reviewing applications, to determine whether the consultant is still involved with the applicant or whether there are concerns or issues that require further investigation or information.

(4) Support for administrative assistance provided by state agencies

The E-rate program relies heavily on state coordinators to conduct training, provide technical assistance, review technology plans, and provide state level coordination. State E-rate coordinators from both the library and school communities play a major role in protecting program integrity, especially as relates to waste, fraud, and abuse. They help applicants avoid mistakes and bad actors in the program.

Among the services state agencies provide are the following: review and approval of technology plans; standardized format for reported National School Lunch Program percentages by school; ongoing guidance for applicants through the application process; alerting the Administrator to problems experienced in the field with interpretations and on-line functionality; and assistance with appeals. The coordinators' active support allows the SLD to save on program overhead by supplementing the number of staff dedicated to these tasks.

Therefore, it is imperative that those coordinators be well trained and informed about the program and its processes. At a minimum, we ask that compensation include the following: paying for travel and lodging expenses to the annual Train-the-Trainers meeting; costs related to reviewing and approving technology plans; subsidize states for local and regional training; and provide a stipend to each state for specific services provided within the state.

If the Commission is unwilling to underwrite the costs of bringing trainers to annual training sessions then it must greatly enhance the outreach currently offered by the Administrator to include, at a minimum, regional and state-based train the trainer sessions and more extensive web-based training materials.

b. Application and Review Process

(1) Streamline Multi-year Contract Reviews

The review process for Priority 1 multi-year contracts and recurring tariff/month-to-month services should be streamlined to reduce administrative costs. Currently, the second and third years of these services are reviewed as if nothing had transpired the previous year. This means that applicants fax the same contracts and the same fixed price bills to PIA every year even though the only change may be the FRN. We submit this category of services has virtually no opportunity for waste, fraud, or abuse once it is approved and accepted by the program administrator. The impact on the applicant is obvious, is not good customer service, and casts a poor light on the program and the Administrator. We believe implementation could have a significant cost for system changes, but would pay for itself in cost avoidance fairly quickly. Staff formerly reviewing applications with no likelihood of waste, fraud, and abuse could devote their energies to pursuing problem applications.

200 **(2) Large state and regional consortia application processing**

201
202 We are greatly concerned that the Administrator does not process in a timely manner many large-dollar
203 statewide and regional consortia applications for Internet access and telecommunications funding. The
204 fiscal stress and cash flow problems of many consortia (and large applicants) have reached an
205 unacceptable level. We request that the Administrator establish a unit staffed by experienced reviewers
206 dedicated to processing large-dollar and/or complex consortia applications.

207
208 Furthermore, we ask the Commission to direct the Administrator to assess the criteria for inclusion of
209 applications into this group. This proposal should in no way be construed to discourage timely review of
210 smaller applications. In our view, a solution that harms the many small applicants would not be
211 acceptable.

212
213 **(3) Take the Steps and Allocate the Resources Necessary to Complete the Application Review**
214 **Process In a Timely Manner.**

215
216 A significant number of applicants, particularly statewide networks and other large organizations do not
217 have their applications reviewed until well into the program year. This delay in making funding
218 commitments is causing cash flow problems for applicants and does not foster good relationships with
219 vendors.

220
221 Additionally, a significant number of applicants have funding delayed due to an overly long process for
222 handling appeals. A long process, including excessive additional delays once an appeal has been granted,
223 discourages appeals and disadvantage applicants. Some applicants reported waiting an additional 6 to 12
224 months before receiving a Funding Commitment Decision Letter following a successful appeal. The
225 ALA recommends that steps be taken to insure timely application and appeals review and processing with
226 specific deliverables for the Administrator established by the Commission.

227
228 **(4) The application and approval process for recurring services and existing contracts should be**
229 **streamlined so as to leverage prior years' review and approval of those services.**

230
231 We have long held that the Administrator should treat applicants like customers.
232 Unfortunately, each year each application is subjected to PIA review as if it were a brand new application.
233 Part of the problem is a lack of staff continuity, addressed later in this response. We stress that the vast
234 majority of applicants make every attempt to honestly request proper discounts for eligible services year
235 after year. Certain services such as recurring telephone, multi-year contracts, or even broadband
236 connections are straightforward and similar, if not identical from year to year.

237
238 However, each year approximately 20 percent of applications are denied, largely due to procedural errors
239 or miscommunication between applicants and reviewers. Often, multi-year contracts or state master
240 contracts are included in the annual denial quota. We believe this is an unacceptably high denial rate and
241 creates a perception by applicants that discounts on even the most basic of telecommunications services
242 are not certain and that the review process is set-up for increase funding denials.

243
244 Using five years' experience from applications representing essentially the same entities each year, we
245 ask the Commission to direct the Administrator to use its existing database and establish a mechanism for
246 evaluating a baseline of service eligible for discounted service which would pass PIA review without
247 undue scrutiny. The baseline could include basic telephone service, or broadband connections. For
248 example, if a school ordered a T1 circuit in funding year four and five, it would be reasonable to assume
249 the school will again order a T1 circuit in year six. The PIA reviewer, using past requests should be able

to process the application with a minimum of effort, regardless of minor procedural issues with applications.

(5) Applicants should be given the option of reviewing SPIF's before payment is made

Occasionally, service providers will bill the Administrator for most or all of committed funding before actually completing contracted work. Under the current rules, there is no mechanism for applicants to restrict or limit payments to service providers.

The primary purpose of the Form 486 is to indicate to the Administrator that services have begun and the Administrator may pay invoices from service providers or BEAR reimbursements to applicants through service providers. Once a Form 486 has been submitted to the Administrator, there is no restriction on the amount of payment the service provider can receive by submitting a Service Provider Invoice Form (SPIF or Form 474), up to the full funding commitment amount.

The Commission should give applicants the option of reviewing the SPIF prior to SLD payment. This can be accomplished with an additional check-off box on the Form 486 indicating the applicant requires review and signoff of the Form 474 contents before submission to the Administrator. In recognition of provider automated billing systems, we propose this action be completed between the SLD and the applicant after the SPIF is submitted to the SLD.

Adoption of this suggestion will further reduce fraud in the program without imposing additional requirements of applicants that do not wish to review service provider invoices.

c. Eligible Services

(1) The funding process for basic telephone service including POTS, cell phone and long distance (services not requiring a technology plan) should be streamlined.

Many small applicants are intimidated by the complexity of the program and by the application review process imposed on them. One common denominator for all applicants of the program is POTS (local and long distance, including basic cell phone) services. Since the services in this category are the most homogeneous in the E-rate Program, we believe there should be a highly streamlined process to obtain discounts for POTS services. We believe this proposal will greatly simplify administrative processes, increase participation by schools and libraries in the E-rate program, provide for fair and equitable treatment for all POTS services applicants, and streamline the filing process. We see two options:

1. Proposed Solution - Option 1: Applications for POTS services that do not require Tech Plans should be handled by the provider community directly to USAC. Applicants would be required to certify their discount percentage to the provider. The provider would then apply to USAC for recovery of the undiscounted portion. Maximum funding would be limited to the previous year plus 5% to accommodate increased use, price increases, etc. The applicant would complete no SLD forms, although providers may provide a form to capture data for their records. Applicants requesting service that requires a Tech Plan or

¹ Bertot, John Carlo, and McClure, Charles R., (2002) Public Libraries and the Internet 2002: Internet Connectivity and Networked Services. p.4. Tallahassee, FL: Information Use Management and Policy Institute, Florida State University. Available at: <http://www.ii.fsu.edu>.

who have justification for greater than the maximum 5% increase ceiling would follow the current E-rate application process.

1. Proposed Solution - Option 2: All applicants would be eligible for a flat 50% discount for POTS services. No FRDL data would need to be passed between applicants, providers, and USAC. If an applicant has a greater E-rate discount level, they would be free to follow the current process to secure E-rate discounts for POTS services at their discount level. Anecdotal information indicates a great many 70% and 80% applicants would accept this option simply to avoid what they consider an overly complex process.

ALA believes this approach would work equally well with all telecommunications services. There is concern that this approach is such a dramatic departure from current business practices that the FCC may be unwilling to make such a sweeping change. Therefore, ALA advocates the above recommendation be implemented with a view to expanding to all telecommunications services. ALA believes that no changes in legislation are required to implement this proposal. Recommend the Commission pursue further development of this proposal through discussions with ALA, SECA, and the vendor communities.

(2) Strengthen the definition of “maintenance”

While protecting the investment in equipment through warranties is essential, the maintenance category has expanded to network management, help desks, project management and other services. Clearly delineating and limiting the definition of “maintenance” will promote consistency and limit extraneous items from being inserted into this category. Therefore, the Commission should strengthen the definition of maintenance to preclude funding for ineligible help desk and on-site maintenance staff.

Maintenance should not include funding for warranties on wiring, labor, or services. Currently these service definitions are overly broad and vague which invites opportunities for waste, fraud, and abuse. We propose that the definition of maintenance be restrictively defined as manufacturer’s warranty or original manufacturer equipment maintenance contract for hardware only. Third party equivalents would be permitted, but limited, based on manufacturers’ warranty/extended maintenance cost. Contracts including personal services would be prohibited.

Maintenance on internal connections should be eligible for Priority Two funding for up to two years per funding request in accordance with the recommendation for a two-year application cycle for internal connections funding requests. It will allow the maintenance on equipment to continue during the year the entity is not eligible to apply for internal connections. Two year warranties would be eligible as part of the acquisition price if alternate year application proposals are implemented.

(3) Permit Changes or Upgrades to Service in Mid-Year

ALA strongly encourages the Commission to broaden the current service change policies. Often applicants find they can purchase better products or greater increments of service for slightly more money due to price changes between the time discounts were requested and orders are placed or in mid year. The program should encourage applicants to upgrade services, especially since there is no increase in cost to the program. This disincentive to innovate or improve services should be immediately removed. Because of the current policy, applicants’ cannot respond to quickly changing technological conditions. A potential result is that funding commitments may be unused for that funding year.

Given the significant delay between the filing of the Form 471 and the receipt of services, the prices of services and equipment may have changed, and/or newer products with similar or better functionalities

may be available. In addition, additional funding may have become available through other sources, enabling the purchase of greater bandwidth or more capable products/services.

We advocate that applicants be given broad authority within the context of their contract vehicles, to modify equipment and services provided the changes are for like or similar services. We believe the Commission should permit applicants to upgrade their services or equipment mid-year as long as their funding commitment cap was not exceeded. Applicants should not be penalized for investing in greater bandwidth, for example, simply because they need to wait until the following funding year. A written notice to the SLD, which describes the change/substitution, should be required. And as long as the upgrade or change was permitted under local or state procurement rules, the change would be permitted. This scenario is very similar to the budget/contract revisions that are permitted under many grant program guidelines.

This liberalization of the service substitution/upgrade policy is consistent with the vendor change process. Just as the SPIN change policy was choking applicants during the first three years of the program, the current service substitution policy is having the same effect. We encourage the Commission to understand applicants' needs to change or upgrade services in mid-funding year, beyond equipment substitutions, and grant relief as soon as possible.

d. Procurement Practices

USAC frequently notes that it does not make policy. Unfortunately for the applicant community, that is precisely what they are doing with expansion of audits and PIA reviews about the internal working of local procurement. By their actions, USAC (including its subordinate elements and contractors) is heavily impacting local procurement policy.

In the Report and Order adopted May 7, 1997, the Commission declined to mandate additional competitive bidding requirements, other than price as the primary factor and compliance with state or local procurement regulations. Section 482 of the Order specifically states: "Thus, although we do not impose bidding requirements, neither do we exempt eligible schools and libraries from compliance with any state or local procurement rules, such as competitive bidding specifications, with which they must otherwise comply."

If there are to be additional requirements set upon the applicants and the providers, the FCC must undertake a rule making process to establish them. To our knowledge, there has been no such process. The procurement area has been gradually expanded via denials, decisions upholding or affirming denials, or by the SLD imposing additional requirements during the review process.

In addition, there is no Congressional intent that addresses the competitive bidding issue. The enabling legislation does not mention competitive bidding requirement in the six guiding principles. Congress did allow the FCC to set "Such other principles as the Joint Board and the Commission determine are necessary and appropriate for the protection of the public interest, convenience, and necessity and are consistent with this act." [47 USC 254(b)] In the Order, the FCC adopted only one other principle - Competitive Neutrality. As defined in Section 48 of the Order, competitive neutrality is defined as "that universal service support mechanisms and rules neither unfairly advantage one provider over another, and neither unfairly favor or disfavor one technology over another.

The basis for rules and procedures covering the Form 470 and competitive bidding practices is this single statement - not establishing rules that advantage one provider over another. In our opinion, the FCC and USAC are operating outside their knowledge base and have overstepped their authority. The foregoing appears very clear; state and local rules are the rule.

This invariably leads to the question of how to handle private schools and applicants that are not covered by state or local procurement rules. We believe the answer is simple. Applicants that are in this category must take one of three actions: 1) Adopt state procurement rules; 2) Adopt the rules of another local school/library; or 3) Develop their own legally enforceable rules. The question of whether an applicant follows their own procurement rules and procedures would be an audit subject.

We believe it is beyond the purview of the FCC and USAC to specify detailed procurement practices. We agree that the FCC and USAC can mandate that applicants have procedures and practices that meet certain minimum acceptable standards, but leave it a local decision on how to meet the standards. The current approach is analogous to a teacher punishing the entire class for the misdeeds of one student. In this case, the FCC and USAC are forcing a burdensome reporting and application process on the entire program to prevent misdeeds by a few contractors and applicants.

The review and audit approach taken by FCC and USAC is literally driving small applicants from the program. ALA maintains that the small applicants are the ones most in need of the Program. No set of procedure or practices will entirely prevent an unscrupulous provider or applicant from committing an illegal act or finding a creative way to circumvent program rules. In our view the best prevention is a set of clear standards that can be quickly and easily verified through a desk audit, followed by enforcement action against serious and repeat offenders. Making the rules more complex and adding an administrative burden to the applicant community will not prevent misdeeds by the few. It will, however, drive the smaller applicant from the Program.

e. Other Waste, Fraud and Abuse Issues

(1) Duplicative services rulings must be carefully implemented

In the Second Order in Docket CC 02-6, the FCC adopted measures to improve program oversight and prevent waste, fraud and abuse. Among the measures adopted, the Commission clarified that requests for duplicative services – services that deliver the same functionality to the same people during the same period of time – will not be funded. We agree that taking actions like these are necessary to avoid waste in the program.

Nevertheless, the FCC/SLD must recognize the level of analysis necessary to accurately avoid denials that would negatively affect large consortium applications. For example, a consortium provides telecommunications (e.g. T-1's) and Internet access services to member entities across its state. On their own, members of the consortium also obtain discounts on telecommunications services (i.e. local and long-distance services) and other Internet access services (i.e. leased WAN/LAN services, e-mail) that could be construed as duplicative, when in fact, they are not.

We ask that the FCC and the Administrator implement the following to avoid inappropriate denials to consortia and their members: A thorough process to identify duplicative service funding requests that get at core services and functions beyond a service category level; a pre-FDCL process that consults both affected parties to resolve any potential situations; and when the consortia has a valid LOA from the entity, the consortia is the prevailing application that receives the funding request.

(2) Annually convene a task force composed of representatives of the applicant and service provider communities to discuss and address operational issues and improvements

The SLD had prior success with Task Forces, which were convened to address specific issues, such as the Year 3 Task Force. The results included a number of suggestions that were implemented, improved

efficiency of the application process, created a greater understanding between applicants and service providers, developed better forms and instructions, and improved the information gathering processes. This type of Task Force should be revived on an annual basis. Both the applicant and service provider communities should be represented to further enhance their understanding of the others' requirements and needs, and to ensure that there is a "cradle to grave" perspective given to discussions. The SLD must consider not only program improvements, but also the far reaching effects such improvements may have, including their consistency with other policies and procedures.

(3) An independent USAC ombudsman should be established to facilitate issues resolution

The SLD, with operational units scattered across the country, each with its own unique administrative structure, often has system or functionality issues that adversely affect efficient operation of the program. The Schools and Libraries Division (SLD) has operational units located in Lawrence, Kansas; Whippany, New Jersey; and Washington DC. These units perform distinctly different functions in support of the E-rate program.

On occasion, problems arise in the units affecting applicants. An independent individual, well versed in program rules and department functions is necessary to analyze the units and identify systemic issues and inefficiencies. The Ombudsman will report findings and recommendations to USAC leadership and the USAC Board of Directors.

(4) Use the Data Retrieval Capability to Evaluate the Program, Identify Patterns of Use, and Publish the Results to Make the Process as Transparent As Possible

The SLD is commended for making the "Funding Request Data Retrieval" function available at its web site. The ALA believes that the best way to encourage appropriate applicant and vendor behavior is to open the program to the sunlight of public examination and review. The ALA recommends that the SLD perform and publish analysis itself or take active steps to encourage and facilitate analysis by third parties so that patterns of program usage can be known. This will provide the E-rate community, administrators, legislators, and the public with a substantiated basis for evaluating the program and making well-informed decisions about program improvements.

(5) Service providers, applicants and consultants should be debarred for willful or repeated violations of program rules

We applaud the initial steps the Commission took in this effort with the April 29, 2003 Second Order. However, there remains insufficient enforcement authority by the Commission or Administrator to ensure that there are severe consequences for program violations that are willful and or repeated.

Regulations should go beyond debarment from the program for criminal conduct and include willful or repeated violations of program rules. This debarment for willful or repeated program violations would be applied against service providers, applicants and consultants.

Debarment terms could be tied to the severity of the violations and should include not only length of nonparticipation but also whether the debarment operates across all service categories or is limited. The Commission asked extensive excellent questions relating to debarment and disbarment. Rather than responding to each individual question and issue, we believe that the Commission should have flexibility

488 and discretion when developing a fair, consistent and effective framework for debarment, disbarment, and
489 referral of cases that may involve criminal activity.

490
491 In summary, ALA and its E-rate Taskforce appreciate this opportunity to share our perspective of this
492 valuable program and applaud the FCC's efforts to continually improve E-rate administration.